

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Case No. 1:23-cv-00369-NRM-RML

Plaintiff,

-against-

**RESPONSE TO ORDER TO SHOW
CAUSE**

RARE BREED TRIGGERS, LLC; RARE BREED FIREARMS, LLC; LAWRENCE DEMONICO; KEVIN MAXWELL,

Defendants.

DECLARATION OF LAWRENCE DEMONICO

I, Lawrence DeMonico, declare under penalty of perjury that the following is true and correct to the best of my present knowledge, information and belief:

1. I am the President of Rare Breed Triggers, LLC (RBT), and I reside in Austin, Texas.
2. I am familiar with the operations and management of RBT, and the facts set out in this declaration are based on my personal knowledge.
3. RBT was incorporated in Florida as a limited liability company in April 2020. It since reformed as a North Dakota, LLC in November 2021.
4. RBT, manufactures and sells firearms accessories and related merchandise, including the FRT-15. It has also sold the Wide Open Trigger.
5. As the President of RBT, I manage RBT's daily operations, and am responsible for coordinating all aspects of its sales, such as maintaining supply, overseeing distribution, creating promotional materials and managing accounts.
6. I have been in this position since RBT was formed in April 2020.
7. I have resided in Texas continuously since RBT was formed in April 2020.

8. RBT originally operated out of Orlando, Florida.

9. Between November 2021, when RBT was organized as a North Dakota company, and December 2022, RBT stored its triggers primarily in North Dakota. However, during that time, I oversaw RBT's operations from Texas, and RBT maintained its website, created promotional materials and managed distribution, such as by printing shipping labels, from Texas.

10. Since December 2022, RBT has moved all of its operations to Texas, although it remains a North Dakota company.

11. RBT currently stores its business records, maintains its website, and creates promotional content in Texas.

12. Kevin Maxwell is the owner of RBT.

13. Mr. Maxwell does not manage the daily affairs of RBT.

Executed on March 29, 2023



Lawrence DeMonico